UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA WINSTON-SALEM DIVISION

FEDERAL TRADE COMMISSION, STATE OF CALIFORNIA, STATE OF COLORADO, STATE OF ILLINOIS, STATE OF INDIANA, STATE OF IOWA, STATE OF MINNESOTA, STATE OF NEBRASKA, STATE OF OREGON, STATE OF TENNESSEE, STATE OF TEXAS, STATE OF WASHINGTON, and STATE OF WISCONSIN,

Case No. 1:22-cy-00828-TDS-JEP

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG, SYNGENTA CORPORATION, SYNGENTA CROP PROTECTION, LLC, and CORTEVA, INC.,

Defendants.

IN RE CROP PROTECTION PRODUCTS LOYALTY PROGRAM ANTITRUST LITIGATION

This document relates to: ALL ACTIONS

Case No. 1:23-md-3062-TDS-JEP

JOINT CONSENT MOTION FOR ENTRY OF DISCOVERY COORDINATION ORDER

Pursuant to this Court's May 23, 2024 direction, (Minute Entry 05/24/2024), all Plaintiffs and Defendants in the above-captioned actions, (together, the "Parties"), by and through their undersigned attorneys, respectfully submit this Joint Motion for Entry of

Coordination Order. The Parties certify that, consistent with Local Rule 37.1(a), they have conferred with opposing counsel in both above-captioned cases on the content of the coordination order as directed by this Court and have agreed that the Discovery Coordination Order reflects this Court's direction and is otherwise agreeable to the Parties.

Dated: June 14, 2024 Respectfully submitted,

/s/ Allyson M. Maltas

ALLYSON M. MALTAS

Senior Trial Counsel

Federal Trade Commission

Bureau of Competition

600 Pennsylvania Avenue, NW

Washington, DC 20580 Telephone: (202) 326-3646

Email: amaltas@ftc.gov

KARNA ADAM JOSEPH R. BAKER WESLEY G. CARSON ROBERT Y. CHEN ELIZABETH A. GILLEN PHILIP J. KEHL

Attorneys for Plaintiff Federal Trade Commission

s/ Nicole S. Gordon

NICOLE S. GORDON

Deputy Attorney General

Office of the California Attorney General CONOR J. MAY

455 Golden Gate Avenue, Suite 11000

San Francisco, CA 94610

Telephone: (415) 510-4400

Email: nicole.gordon@doj.ca.gov

Attorney for Plaintiff State of California

/s/ Conor J. May

MICHAEL J. TURNER

JAN M. ZAVISLAN

Senior Counsel

Assistant Attorney General

Colorado Department of Law

Office of the Attorney General

Ralph L. Carr Judicial Center

1300 Broadway, 7th Floor

Denver, CO 80203

Telephone: (720) 508-6000

Email: Jan.Zavislan@coag.gov

Conor.May@coag.gov

Attorneys for Plaintiff State of Colorado

/s/ Paul J. Harper

PAUL J. HARPER

Assistant Attorney General, Antitrust Office of the Illinois Attorney General 115 S. LaSalle Street Chicago, IL 60603 Telephone: (312) 814-3000

Email: paul.harper@ilag.gov

Attorney for Plaintiff State of Illinois

/s/ Noah Goerlitz

NOAH GOERLITZ

Assistant Attorney General Office of the Iowa Attorney General 1305 E. Walnut St.

Des Moines, IA 50319 Telephone: (515) 725-1018

Email: noah.goerlitz@ag.iowa.gov

Attorney for Plaintiff State of Iowa

/s/ Matthew Michaloski

MATTHEW MICHALOSKI

CHRISTI FOUST

Deputy Attorneys General

SCOTT BARNHART

Chief Counsel and Director of Consumer

Protection

Office of the Indiana Attorney General

Indiana Government Center South – 5th Fl.

302 W. Washington Street

Indianapolis, IN 46204-2770

Telephone: (317) 234-1479

Email: matthew.michaloski@atg.in.gov

christi.foust@atg.in.gov scott.barnhart@atg.in.gov

Attorneys for Plaintiff State of Indiana

/s/ Katherine Moerke

KATHERINE MOERKE

JASON PLEGGENKUHLE

ELIZABETH ODETTE

Assistant Attorneys General

Office of the Minnesota Attorney General

445 Minnesota Street, Suite 1200

St. Paul, MN 55101-2130

Telephone: (651) 296-3353

Email: katherine.moerke@ag.state.mn.us

jason.pleggenkuhle@ag.state.mn.us

elizabeth.odette@ag.state.mn.us

Attorneys for Plaintiff State of Minnesota

/s/ Colin P. Snider

COLIN P. SNIDER

JUSTIN C. MCCULLY

Office of the Attorney General of

Nebraska

2115 State Capitol Building

Lincoln, NE 68509

Telephone: (402) 471-3840

Email: Colin.Snider@nebraska.gov

Justin.McCully@nebraska.gov

Attorneys for Plaintiff State of Nebraska

/s/ Hamilton Millwee

HAMILTON MILLWEE

Assistant Attorney General

TATE BALL

Assistant Attorney General

Office of the Attorney General of

Tennessee

P.O. Box 20207

Nashville, TN 37202

Telephone: (615) 291-5922

Email: Hamilton.Millwee@ag.tn.gov

Tate.Ball@ag.tn.gov

Attorneys for Plaintiff State of Tennessee

/s/ Timothy D. Smith

TIMOTHY D. SMITH

Senior Assistant Attorney General Antitrust and False Claims Unit

Oregon Department of Justice

100 SW Market St

Portland, OR 97201 Telephone: (503) 934-4400

Email: tim.smith@doj.state.or.us

Attorney for Plaintiff State of Oregon

/s/ William Shieber

JAMES LLOYD

Chief, Antitrust Division

TREVOR YOUNG

Deputy Chief, Antitrust Division

WILLIAM SHIEBER

Assistant Attorney General

Office of the Attorney General of Texas

300 West 15th Street Austin, TX 78701

Telephone: (512) 936-1674

Email: William.Shieber@oag.texas.gov

Attorneys for Plaintiff State of Texas

/s/ Luminita Nodit

LUMINITA NODIT

Assistant Attorney General,

Antitrust Division

Washington State Office

of the Attorney General

800 Fifth Ave., Suite 2000

Seattle, WA 98104

Telephone: (206) 254-0568

Email: Lumi.Nodit@atg.wa.gov

Attorney for Plaintiff State of Washington

/s/ Laura E. McFarlane

LAURA E. MCFARLANE

Assistant Attorney General

Wisconsin Department of Justice

Post Office Box 7857

Madison, WI 53707-7857

Telephone: (608) 266-8911

Email: mcfarlanele@doj.state.wi.us

Attorney for Plaintiff State of Wisconsin

5

/s/ Daniel L. Brockett

Daniel L. Brockett (pro hac vice)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel. (212) 849-7345
Facsimile (212) 849-7100
danbrockett@quinnemanuel.com
Interim Class Counsel

Steig D. Olson (pro hac vice)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue
New York, New York 10010
Phone (212) 849-7231
Fax (212) 849-7100
steigolson@quinnemanuel.com
Interim Class Counsel

Sami H. Rashid (pro hac vice)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel. (212) 849-7237
Facsimile (212) 849-7100
samirashid@quinnemanuel.com
Interim Class Counsel

/s/ Jay J. Chaudhuri

Jay J. Chaudhuri
N.C. State Bar No. 27747
COHEN MILSTEIN SELLERS & TOLL
PLLC
50 Fayetteville St., Suite 980
Raleigh, NC 27601
Telephone (919) 890-0560
Facsimile (919) 890-0567
jchaudhuri@cohenmilstein.com
Interim Class Counsel

Michael B. Eisenkraft (pro hac vice)
COHEN MILSTEIN SELLERS & TOLL
PLLC
88 Pine Street, 14th Floor
New York, New York 10005
Telephone (212) 838-7797
Facsimile (212) 838-7745
meisenkraft@cohenmilstein.com
Interim Class Counsel

Nina Jaffe-Geffner (pro hac vice)
COHEN MILSTEIN SELLERS & TOLL
PLLC
1100 New York Avenue, Suite 500, NW
Washington D.C. 20005
Tel: (202) 408-4600
Njaffegeffner@cohenmilstein.com
Interim Class Counsel

Jeremy Andersen (pro hac vice)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Tel. (213) 443-3685
Facsimile (213) 443-3100
jeremyandersen@quinnemanuel.com
Interim Class Counsel

/s/ Vincent Briganti

LOWEY DANNENBERG, PC
Vincent Briganti (pro hac vice)
Christian Levis (pro hac vice)
Margaret MacLean (pro hac vice)
Roland R. St. Louis, III (pro hac vice)
44 South Broadway, Suite 1100
White Plains, New York 10601
Tel. (914) 997-0500
Fax: (914) 997-0035
vbriganti@lowey.com
clevis@lowey.com
mmaclean@lowey.com
rstlouis@lowey.com

/s/ Lyn K. Broom

Interim Class Counsel

Richard L. Pinto N.C. State Bar No. 9412
Kenneth Kyre, Jr. N.C. State Bar No. 7848
Lyn K. Broom N.C. State Bar No. 17674
PINTO COATES KYRE & BOWERS,
PLLC
3202 Brassfield Road
Greensboro, NC 27410
Tel: (336) 282-8848
Facsimile: (336) 282-8409
rpinto@pckb-law.com
kkyre@pckb-law.com
lbroom@pckb-law.com
Liaison Counsel

/s/ Christopher M. Burke
Christopher M. Burke
Walter Noss
Yifan (Kate) Lv
KOREIN TILLERY PC
707 Broadway, Suite 1410
San Diego, CA 92101
Tel: (619) 625-5621
cburke@koreintillery.com
wnoss@koreintillery.com
klv@koreintillery.com
Interim Class Counsel

/s/ Patrick M. Kane

Patrick M. Kane N.C. Bar No. 36861 pkane@foxrothschild.com FOX ROTHSCHILD LLP 230 N. Elm Street, Suite 1200 PO Box 21927 (27420) Greensboro, NC 27401 Telephone: 336.378.5200 Facsimile: 336.378.5400

Paul S. Mishkin*
paul.mishkin@davispolk.com
David B. Toscano*
david.toscano@davispolk.com
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, NY 10017
Telephone: (212) 450-4292
Facsimile: (212) 701-5292

Attorneys for Defendants Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC

/s/ Mark E. Anderson

Mark E. Anderson N.C. Bar No. 15764 manderson@mcguirewoods.com MCGUIREWOODS LLP 501 Fayetteville Street, Suite 500 Raleigh, NC 27601 Telephone: 919.755.6600 Facsimile: 919.755.6699

David R. Marriott**
dmarriott@cravath.com
Margaret T. Segall**
msegall@cravath.com
Jesse M. Weiss**
jweiss@cravath.com
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, NY 10019
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

Attorneys for Defendant Corteva, Inc.

^{*}Specially appearing under L.R. 83.1(d)

^{**} Specially appearing under L.R. 83.1(d)